

EXHIBIT A

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' MOTION TO COMPEL
 GOOGLE TO PRODUCE DAMAGES-
 RELATED DOCUMENTS**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Plaintiffs' motion to compel Google to produce damages-related documents in response to RFP No. 259 (the "Motion"). Plaintiffs' Motion is **GRANTED**.

Within three business days of this Order, Google shall produce to Plaintiffs the financial analysis discussed in the Motion, where Google internally quantified its revenues attributable to users' visits to non-Google websites during Incognito browsing sessions.

In addition, Google shall conduct a reasonably diligent investigation for any analyses, studies, or models that sought to quantify revenues attributable to WAA-off traffic. Google may not limit its investigation in any way. For example, Google may not exclude web data from its investigation, nor may Google exclude data collected from Google websites and apps. Google relatedly may not limit its investigation to data collected via Google Analytics for Firebase. Google shall identify and produce to Plaintiffs all analyses, studies, or models that sought to quantify any kind of WAA-off data.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge